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9 **Attorneys for Defendant**
10 **GARY GOULIN**

11 **UNITED STATES DISTRICT COURT**

12 **CENTRAL DISTRICT OF CALIFORNIA**

13 THE UNITED STATES OF)	CASE NO.: 22-CR-00476-MEMF
14 AMERICA,)	
15 Plaintiff,)	MEMORANDUM REQUESTING
16 vs.)	MODIFICATION TO THE
17)	REVISED PRE-SENTENCE
18)	REPORT
19 GARY GOULIN,)	
20 Defendant)	
)	

21 Defendant Gary Goulin, by and through his counsel, WERKSMAN JACKSON &
22 QUINN LLP, (hereinafter "Defendant") files this Memorandum in support of his
23 request that the Court note two modifications to the Revised Pre-Sentence Report
24 (ECF Doc. No. 39). Per the Court's order, the parties have met and conferred on
25 these requests.

26 First, Paragraph 80 of the Revised PSR states: "Goulin's specific
27 benzodiazepines of choice are Ambien, Zampoten, and Clozapine." This should be
28 modified to read: "Goulin's specific benzodiazepines of choice are Ambien

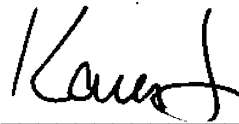
1 (Zolpidem) and Clonazepam.” Clozapine is an antipsychotic for treating
2 schizophrenia, which Mr. Goulin has never taken. Clonazepam is the generic name
3 for Klonopin, a common benzodiazepine which Mr. Goulin has been prescribed.
4 There is no such drug as Zampoten. Rather, this should indicate Zolpidem, the
5 generic name for Ambien. Mr. Goulin has notified the United States Probation
6 Officer of this modification. The government does not oppose this modification.

7 Second, Mr. Goulin requests that his entire statement, Exhibit A of his
8 sentencing memorandum (ECF Doc. No. 36), be incorporated as part of the Pre-
9 Sentence Report. His statement may be useful to the Bureau of Prisons in
10 evaluating his suitability for programming. The government opposes this
11 modification because the content of Mr. Goulin’s statement is unverified and
12 defendant statements are not a standard feature of the PSR. They maintain that an
13 exception should not be made for Mr. Goulin.

14 Mr. Goulin respectfully asks that the Court accept these modifications to the
15 Revised Pre-Sentence Report.

16
17 October 18, 2023

Respectfully submitted,

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20 Mark J. Werksman

21 Karen M. Sosa

22 Attorneys for Defendant Gary Goulin
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